

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

MLCJR LLC, *et al.*,¹

Debtors

Chapter 7

Case No. 23-90324 (CML)

Jointly Administered

**NOTICE OF HEARING ON TRUSTEE’S MOTION PURSUANT TO BANKRUPTCY
CODE SECTION 363 AND BANKRUPTCY RULE 9019 FOR APPROVAL OF
SETTLEMENT WITH THE HEDRON PARTIES & UNDERWRITERS;
AUTHORIZING THE DISTRIBUTION OF THE PROCEEDS FROM THE
SETTLEMENT AND THE RETENTION OF FUNDS BY THE ESTATE
FREE AND CLEAR OF ALL LIENS, CLAIMS AND ENCUMBRANCES;
APPROVAL OF CONTINGENCY FEE AND EXPENSES
OF FISHMAN HAYGOOD LLP ON A FINAL BASIS;
AND FOR RELATED RELIEF**

[Related Docket No. 2417]

1. On April 2, 2025, Michael D. Warner, solely in his capacity as chapter 7 trustee for the above-captioned administratively consolidated estates, filed that certain *Trustee’s Motion Pursuant to Bankruptcy Code Section 363 and Bankruptcy Rule 9019 for Approval of Settlement with the Hedron Parties & Underwriters; Authorizing the Distribution of the Proceeds from the Settlement and the Retention of Funds by the Estate Free and Clear of all Liens, Claims and Encumbrances; Approval of Contingency Fee and Expenses of Fishman Haygood LLP on a Final Basis; and for Related Relief* [Doc. No. 2417] and related proposed order [Dkt. No. 2418] (the “Motion”). Should you not have access to PACER, a copy of the Motion is available from undersigned counsel upon request.

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: MLCJR LLC (0875); Cox Oil Offshore, L.L.C. (7047); Cox Operating, L.L.C. (0939); Energy XXI GOM, LLC (0027); Energy XXI Gulf Coast, LLC (8595); EPL Oil & Gas, LLC (9562); and M21K, LLC (3978).

2. **PLEASE TAKE NOTICE** that a hearing on the Motion is scheduled for April 30, 2025 at 9:00 a.m. (prevailing Central Time) before Judge Christopher M. Lopez in Courtroom 401, 515 Rusk, Houston, TX 77002.

3. **PLEASE TAKE FURTHER NOTICE THAT** if you object to the relief requested in the Motion, you must respond in writing. Unless otherwise directed by the court, you must file your response electronically at <https://ecf.txsb.uscourts.gov/> within twenty-one days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Absent a timely and properly filed objection, the court may treat the Motion as unopposed and grant the relief requested.

4. You may participate in the hearing either in person or by an audio and video connection. Audio communication will be by use of the Court's dial-in facility. You may access the facility at (832) 917-1510. Once connected, you will be asked to enter the conference room number. Judge Lopez's conference room number is 590153. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Lopez's homepage. The meeting code is "JudgeLopez". Click the settings icon in the upper right corner and enter your name under the personal information setting. Hearing appearances must be made electronically in advance of electronic hearings. To make your appearance, click the "Electronic Appearance" link on Judge Lopez's homepage. Select the case name, complete the required fields and click "Submit" to complete your appearance.

[This notice continues on the following page.]

Dated: April 3, 2025

Respectfully Submitted,

STEWART ROBBINS BROWN & ALTAZAN, LLC

By: /s/ Paul Douglas Stewart, Jr.
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***Counsel for Michael D. Warner,
Chapter 7 Trustee***

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing pleading was caused to be served upon all parties that are registered to receive electronic service through the court's ECF notice system in the above case on this 3rd day of April, 2025.

/s/ Paul Douglas Stewart, Jr.
Paul Douglas Stewart, Jr.